



6. No policy, practice or custom of Knox County Schools was the moving force behind any of the acts complained of in Plaintiffs' Complaint.

7. Plaintiff is not entitled to attorney's fees, expert fees, or costs under any statute.

8. Defendant Knox County is immune by virtue of sovereign immunity.

9. Defendant Knox County is immune by virtue of common law immunity.

10. Plaintiff is estopped.

11. Plaintiff has waived her claims, if any there are.

12. This matter should be dismissed and Defendant should be awarded such relief as it is entitled, including but not limited to, attorney's fees and costs.

13. Defendant Knox County Board of Education does not allow or tolerate discrimination and denies any allegation that Plaintiff was discriminated against.

14. Defendant Knox County Board of Education does not allow or tolerate retaliation and denies any allegation that Plaintiff was retaliated against.

15. Defendant Knox County Board of Education does not allow or tolerate abuse and denies any allegation that Plaintiff was abused.

16. It is admitted that staff members at Green Academy were instructed to list three choices for transfers when Green Academy was being reconstituted.

17. It is denied that Plaintiff's request for transfer was denied; Plaintiff was transferred to Pond Gap.

18. This defendant has insufficient information to form a belief as to the truth of the allegations contained in Paragraphs Two through Five or Paragraph Eight.

19. It is admitted that Plaintiff was paid \$400.00 (Four Hundred Dollars) in academic years 2006-2007 and 2007-2008. This Defendant does not have information to form a belief as to the truth of the remaining allegations in Paragraph Six.

20. Defendant Knox County Board of Education does not allow or tolerate harassment of faculty, staff or other employees. For further answer, Knox County Board of Education policy GAO is attached hereto as Exhibit A.

21. Paragraph Nine references email communications that were not attached to the Complaint; therefore, this Defendant cannot form a belief as to the truth of the allegations contained in Paragraph Nine.

22. Defendant does not have sufficient information to form a belief as to the truth of the allegations contained in Paragraphs Ten and Eleven of the Complaint.

23. Any allegation not specifically admitted is denied.

Respectfully submitted this 2<sup>nd</sup> day of November, 2010.

s/ Martha Haren McCampbell  
MARTHA HAREN MCCAMPBELL  
BPR # 13265

*Counsel for Defendant Knox County Schools*

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### **CERTIFICATE OF SERVICE**

I hereby certify that on November 2, 2010, a copy of the foregoing Answer was filed electronically. Plaintiff will be served by regular United States Mail, postage prepaid. Parties may access this filing through the Court's electronic filing system.

s/ Martha Haren McCampbell  
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MARTHA HAREN MCCAMPBELL